

## Remarks

Claims 52, 56–63, 72, and 73 remain in this application. Claims 1–51, 53–55, and 64–71 were previously cancelled.

The Examiner has allowed claims 52, 59–63, 72, and 73.

### 1. Amendments to the Specification

The amendment to the specification is made to identify the applications for which the present application claims priority and to identify other applications that may be related to the present application.

### 2. Claims 56–58 are patentable over White

The Examiner rejected claims 56–58 under 35 U.S.C. § 102(e) as being anticipated by White et al., US 7,201,229 (“White”).

It is respectfully submitted that claims 56–58 as amended are not anticipated by White because White fails to teach all of the claimed subject matter. Claims 56–58 recite a tree guide and corresponding alignment member on the utility skid with the alignment member being engageable with the tree guide to align the utility skid with respect to the tree. White completely fails to teach a tree with any such tree guide or a utility skid with a corresponding alignment member.

Additionally, White’s elements 91 and 107 fail to teach a frame that is part of a utility skid as the Examiner suggests. Instead, White describes element 91 as an adapter that lands on the tree 71 and extends the production port up out of the tree and out an alternative lateral production port 101. The lateral production port 101 connects to an intake conduit 107 that connects to a subsea pressure intensifier 109. Adapter 91 and conduit 107 form part of a flow path from the production tubing to the pressure intensifier 109 but would not be considered a frame that is part of a utility skid by one of ordinary skill in the art.

For at least these reasons, it is respectfully submitted that claims 56–58 are patentable.

## Conclusion

During the course of these remarks, Applicant has at times referred to particular limitations of the claims that are not shown in the applied prior art. This shorthand approach to discussing the claims

should not be construed to mean that the other claimed limitations are not part of the claimed invention. They are as required by law. Consequently, when interpreting the claims, each of the claims should be construed as a whole, and patentability determined in light of this required claim construction. Unless Applicant has specifically stated that an amendment was made to distinguish the prior art, it was the intent of the amendment to further clarify and better define the claimed invention and the amendment was not for the purpose of patentability. Further, although Applicant may have amended certain claims, Applicant has not abandoned its pursuit of obtaining the allowance of these claims as originally filed and reserves, without prejudice, the right to pursue these claims in a continuing application.

Should any fees have been inadvertently omitted, or if any additional fees are required, or if any fees have been overpaid, please appropriately charge or credit to those fees to Deposit Account No. 03-0335 of Cameron International, Houston, Texas and consider this paper a petition for any necessary extension of time.

If the Examiner has any questions or comments regarding this communication, he is invited to contact the undersigned to expedite the resolution of this application.

Respectfully submitted,  
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